

1 CINDY COHN (SBN 145997)
2 cindy@eff.org
3 LEE TIEN (SBN 148216)
4 KURT OPSAHL (SBN 191303)
5 MARK RUMOLD (SBN 279060)
6 DAVID GREENE (SBN 160107)
7 JAMES S. TYRE (SBN 083117)
8 ANDREW CROCKER (SBN 291596)
9 ELECTRONIC FRONTIER FOUNDATION
10 815 Eddy Street
11 San Francisco, CA 94109
12 Telephone: (415) 436-9333
13 Fax: (415) 436-9993

14 THOMAS E. MOORE III (SBN 115107)
15 tmoore@rroyleslaw.com
16 ROYSE LAW FIRM, PC
17 1717 Embarcadero Road
18 Palo Alto, CA 94303
19 Telephone: (650) 813-9700
20 Fax: (650) 813-9777

21 RACHAEL E. MENY (SBN 178514)
22 rmeny@kvn.com
23 BENJAMIN W. BERKOWITZ (SBN 244441)
24 MICHAEL S. KWUN (SBN 198945)
25 JUSTINA K. SESSIONS (SBN 270914)
26 PHILIP J. TASSIN (SBN 287787)
27 KEKER & VAN NEST, LLP
28 633 Battery Street
San Francisco, CA 94111
Telephone: (415) 391-5400
Fax: (415) 397-7188

RICHARD R. WIEBE (SBN 121156)
wiebe@pacbell.net
LAW OFFICE OF RICHARD R. WIEBE
One California Street, Suite 900
San Francisco, CA 94111
Telephone: (415) 433-3200
Fax: (415) 433-6382

ARAM ANTARAMIAN (SBN 239070)
aram@eff.org
LAW OFFICE OF ARAM ANTARAMIAN
1714 Blake Street
Berkeley, CA 94703
Telephone: (510) 289-1626

Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

FIRST UNITARIAN CHURCH OF LOS) Case No: 4:13-cv-03287 JSW
20 ANGELES, *et al.*,)
21 v.) Plaintiffs,) STIPULATION AND
22 NATIONAL SECURITY AGENCY, *et al.*,) [PROPOSED] ORDER
23 Defendants.) Courtroom 5, 2nd Floor
24 _____) The Honorable Jeffrey S. White

1 THE FOLLOWING PARTIES, BY AND THROUGH THEIR RESPECTIVE
2 COUNSEL, HEREBY STIPULATE:

3 1. Subject to the Court adopting Paragraph 2 of this Stipulation in full, defendants
4 Admiral Michael S. Rogers, Eric H. Holder, John P. Carlin, James B. Comey and James R.
5 Clapper, only insofar as they are sued in their individual capacity, through their undersigned
6 counsel, accept service of summons and Plaintiffs' Second Amended Complaint in their personal
7 capacity, waive timely service of a summons, and agree they will not challenge the adequacy or
8 timeliness of service.

9 2. No answer or other response to the Second Amended Complaint will be due from
10 these defendants to the extent they are sued in their individual capacity until 30 days after the
11 filing of the Court's decision on the Government Defendants' currently pending motion to
12 dismiss (ECF No. 66).

14 Dated: January 30, 2015

Respectfully submitted,

15 s/ Richard R. Wiebe
16 RICHARD R. WIEBE
17 LAW OFFICE OF RICHARD R. WIEBE

18 CINDY COHN
19 LEE TIEN
20 KURT OPSAHL
21 JAMES S. TYRE
22 MARK RUMOLD
23 ANDREW CROCKER
24 DAVID GREENE
25 ELECTRONIC FRONTIER FOUNDATION

26 THOMAS E. MOORE III
27 ROYSE LAW FIRM

28 RACHAEL E. MENY
29 BENJAMIN W. BERKOWITZ
30 MICHAEL S. KWUN
31 JUSTINA K. SESSIONS
32 PHILIP J. TASSIN
33 KEKER & VAN NEST LLP

1 ARAM ANTARAMIAN
2 LAW OFFICE OF ARAM ANTARAMIAN
3

4

5 *Counsel for Plaintiffs*

6 Dated: January 30, 2015

7 /s James R. Whitman
8 James R. Whitman
9 Trial Attorney
U.S. Department of Justice
Civil Division, Torts Branch
Constitutional Torts Section
1425 New York Ave., N.W.
Washington, DC 20005

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11 *Counsel for Michael S. Rogers, Eric H. Holder,
John P. Carlin, James B. Comey, and James R.
Clapper, only insofar as they are sued in their
individual capacity*

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14 **DECLARATION PURSUANT TO LOCAL RULE 5-1**

15 I, Richard R. Wiebe, hereby declare pursuant to Local Rule 5-1 that Plaintiffs have obtained
16 the concurrence of James R. Whitman, counsel to the Individual Capacity Defendants, in the filing
17 of this document.

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19 Executed on January 30, 2015, in San Francisco, California.

20 s/ Richard R. Wiebe
21 Richard R. Wiebe
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1 **[PROPOSED] ORDER**

2 Pursuant to stipulation, it is ordered that the time for Individual Capacity Defendants
3 Admiral Michael S. Rogers, Eric H. Holder, John P. Carlin, James B. Comey, and James R.
4 Clapper to answer or otherwise respond to Plaintiffs' Second Amended Complaint is extended to
5 30 days after the filing of the Court's decision on the Government Defendants' currently pending
6 motion to dismiss (ECF No. 66).

7 **IT IS SO ORDERED.**

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9 Dated: February 2, 2015


10 JEFFREY S. WHITE
11 UNITED STATES DISTRICT JUDGE
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